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May 21, 2025

BY ECF ONLY

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

GRANTED. The Clerk of Court is directed to terminate the motion at Dkt. 69.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Arun Subramanian".

Arun Subramanian, U.S.D.J.
Dated: May 22, 2025

Re: Giulio Maria Pasinetti v. Icahn School of Medicine at Mount Sinai, et al.
Civil Action No. 1:24-cv-7688 (AS)

Dear Judge Subramanian:

We represent defendants Icahn School of Medicine at Mount Sinai (“ISMMS”), Jessica Moise, Eric J. Nestler, and Barbara Vickrey (collectively “Defendants”) in the above-referenced action, and write to request a 20-day extension of Defendants’ time, from May 27, 2025 to June 16, 2025, to respond to plaintiff Giulio Maria Pasinetti’s (“Plaintiff”) supplemental application for a preliminary injunction. This is Defendants’ first request for such relief, and Plaintiff’s counsel has graciously consented to this request.

By Order dated May 20, 2025, this Court granted Plaintiff’s May 6, 2025 Motion to Further Amend Complaint (the “Leave Motion”) and directed that Defendants file any motion to dismiss Plaintiff’s amended pleadings on or by June 16, 2025. In that Order, the Court further granted Plaintiff’s May 6, 2025 “motion to supplement his application for a preliminary application” and directed Defendants to respond to Plaintiffs supplemental preliminary injunction application by May 27, 2025. Defendants had previously understood Plaintiff’s May 6, 2025 letter motion to be a procedural one (seeking leave to supplement Plaintiff’s prior applications for preliminary injunctive relief) and not a substantive motion (inclusive of the proposed injunctive relief itself). Defendants thus believed that Plaintiff would so “supplement” his application for injunctive relief (if at all) at the same time he filed his amended pleadings, and that Defendants could oppose that application on the merits in conjunction with its proposed motion to dismiss to be filed on June 16, 2025.

The requested extension is necessary because Defendants need additional time to prepare their opposition to the supplemental relief proposed in Plaintiff’s May 6, 2025 letter motion, in particular given the upcoming memorial day holiday weekend. And because the viability of

Plaintiff's injunction application depends in part on the likelihood of success on the merits of the claims set forth in his forthcoming Second Amended Complaint, Defendants believe it would be most efficient to brief its opposition to Plaintiff's injunction application in conjunction with its motion to dismiss, in which Defendants will demonstrate why Plaintiff's claims remain ripe for dismissal, and thus, that they have no likelihood of success on the merits in the first place.

We thank the Court for its time and attention to these matters.

Very truly yours,

By: /s/ *Scott R. Landau*
Scott R. Landau
Olivia Jecklin

cc: all counsel of record (via ECF only)